

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

Melissa Manoogian, on behalf of herself and all others similarly situated,)	
)	
Petitioner,)	1:22-cv-10487-RWZ
)	
v.)	
)	
LoanCare, LLC,)	
)	
Respondent.)	
)	
)	

**DEFENDANT LOANCARE, LLC'S UNCONTESTED MOTION TO EXTEND TIME TO
RESPOND TO CLASS ACTION COMPLAINT**

Defendant LoanCare, LLC (“LoanCare”), by and through its undersigned counsel, respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 6(b), for an Order extending the deadline for LoanCare to respond to the Class Action Complaint [ECF No. 1] to May 25, 2022. In support of this request, LoanCare states as follows:

1. Plaintiff filed the Class Action Complaint on April 1, 2022 [ECF No. 1].
2. LoanCare was served with a copy of the Class Action Complaint on April 4, 2022 [ECF No. 4].
3. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), LoanCare’s response is currently due by April 25, 2022. On April 19, 2022, Plaintiff’s counsel consented to a thirty (30) day extension of time to respond, until and including May 25, 2022.
4. Pursuant to Rule 6(b), this Court may exercise the discretion to extend, for good cause, the time period within which an act must be done, provided that the request is made before the original time period has expired. *See* Fed. R. Civ. P. 6(b)(1)(A).

5. LoanCare requests an extension of time to continue investigating the facts and allegations raised in the Class Action Complaint and to prepare an appropriate response to the Class Action Complaint. LoanCare respectfully submits that the foregoing circumstances constitute good cause and warrant granting the extension requested.

6. The requested extension is made in good faith and not for the purpose of delay, and no party will be prejudiced by this extension.

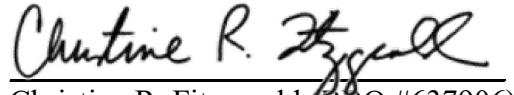
WHEREFORE, Defendant LoanCare, LLC requests entry of an order granting it an extension of time of up to and including May 25, 2022, within which to respond to the Class Action Complaint.

Local Rule 7.01(a)(2) Certification

As required by Local Rule 7.01(a)(2), counsel for LoanCare has conferred with counsel for Plaintiff, who has advised that Plaintiff does not oppose the requested extension of time.

Date: April 22, 2022

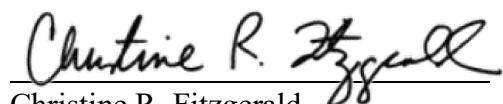
Respectfully submitted,


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Counsel for LoanCare, LLC

CERTIFICATE OF SERVICE

I certify that on April 22, 2022, the foregoing was electronically filed with this Court's CM/ECF System and thereby served on counsel of record.


Christine R. Fitzgerald